

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**CHRISTOPHER A. FAULKNER,
BREITLING ENERGY CORPORATION,
JEREMY S. WAGERS,
JUDSON F. (“RICK”) HOOVER,
PARKER R. HALLAM,
JOSEPH SIMO,
DUSTIN MICHAEL MILLER
RODRIGUEZ, BETH C. HANDKINS,
GILBERT STEEDLEY,
BREITLING OIL & GAS CORPORATION,
CRUDE ENERGY, LLC,
PATRIOT ENERGY, INC.,**

Defendants,

and

**TAMRA M. FREEDMAN
JETMIR AHMEDI**

Relief Defendants.

Case No.: 3:16-cv-01735-D

DEFENDANT CHRISTOPHER FAULKNER’S INITIAL DISCLOSURES

TO: Plaintiff Securities and Exchange Commission by and through its Counsel B. David Fraser, Esq., and Scott Mascianica Esq., Burnett Plaza, Suite 1900, 801 Cherry St., Unit #18, Fort Worth, Texas 76102.

COMES NOW, Defendant Christopher Faulkner (“Defendant”), in his capacity as a Defendant, in this lawsuit, and hereby serves these initial disclosures in compliance with Rule 26(a)(1), Federal Rules of Civil Procedure. Defendant reserves the right to supplement the

following responses, in accordance with the Federal Rules of Civil Procedure.

Respectfully submitted,

FRIEDMAN & FEIGER, L.L.P.

/s/ Lance A. Pool

By: _____

Lawrence J. Friedman

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(972) 788-2667 (Telecopier)

**ATTORNEYS FOR DEFENDANT
CHRISTOPHER FAULKNER**

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2016, I electronically filed the foregoing Entry of Appearance via the Court's CM/ECF filing system, which will send a notice of electronic filing to all CM/ECF participants. I further certify that I served a true and correct copy of the foregoing document and the notice of electronic filing via UPS and electronic mail on all non-CM/ECF parties and/or their counsel as detailed below:

<p>B. David Fraser Scott Mascianica Securities and Exchange Commission Burnett Plaza, Suite 1900 801 Cherry St., Unit #18 Fort Worth, TX 76102 FraserB@sec.gov <i>Attorney for Plaintiff Securities Exchange Commission</i></p>	<p>Michael P. Gibson Burleson, Pate & Gibson, LLP Founders Square 900 Jackson St., Suite 330 Dallas, TX 75202 mgibson@bp-g.com <i>Counsel for Beth C. Hankins</i></p>
<p>Alex More (requested email service only) Carrington Coleman 901 Main St., Suite 5500 Dallas, TX 75202 amore@CCSB.com <i>Counsel for Defendant Gilbert R. Steedley</i></p>	<p>Carole Faulkner 4010 Ambleside Ct. Colleyville, TX 76034 Faulkner4010@yahoo.com <i>Attorney for Defendants Breitling Energy Corporation and Breitling Oil & Gas Corporation</i></p>
<p>Karen Cook, PLLC Karen Cook 700 Park Seventeen Tower 1717 McKinney Ave. Dallas, TX 75202 Karen@karencooklaw.com <i>Counsel for Defendants Parker R. Hallam Crude Energy, LLC</i></p>	<p>Richard B. Roper Thompson & Knight LLP 1722 Routh Street, Suite 1500, Dallas, TX 75201 Richard.Roper@TKLaw.com <i>Attorney for Defendants Dustin Michael Miller Rodriguez and Patriot Energy, Inc.</i></p>
<p>David R. Clouston Sessions Fishman Nathan & Israel LLC 900 Jackson Street, Suite 440, Dallas, TX 75202 DClouston@Sessions.legal <i>Attorney for Defendant Judson D. ("Rick") Hoover</i></p>	<p>Robert R. Smith Fitzpatrick Hagood Smith & UHL 2515 McKinney Avenue, Suite 1400, Dallas, TX 75201 RSmith@FHSUlaw.com <i>Attorney for Relief Defendant Jetmir Ahmedi</i></p>
<p>Jeffrey J. Ansley Gregory D. Kelminson Bell Nunnally & Martin LLP 3232 McKinney Avenue, Suite 1400, Dallas, TX 75204 JAnsley@BellNunnally.com <i>Attorney for Relief Defendant</i></p>	<p>Abbe David Lowell Christopher D. Man Christopher R. Cooke CHADBOURNE & PARKE LLP 1200 New Hampshire Avenue, N.W. Washington, D.C. 20036 adlowell@chadbourne.com <i>Counsel for Tamra M. Freedman</i></p>

/s/ Lance A. Pool

Attorney

DEFENDANT CHRISTOPHER FAULKNER'S INITIAL DISCLOSURES

- A. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.**

RESPONSE:

1. Scott Cox

Defendant is unaware of the current location and logistics as to this person, and will supplement these disclosures upon determination of this information.

2. Jim Hiza

13811 Haven Ridge Lane
Charlotte, NC 28215-7849
(704) 907-1343

3. Kevan Casey

3311 Banbury Place
Houston, Texas 77027
(713) 502-4110

4. Lee Ivons

Defendant is unaware of the current location and logistics as to this person, and will supplement these disclosures upon determination of this information.

5. Steven Plumb

5300 N. Braeswood Blvd., #370
Houston, Texas 77096
(713) 780-0806

6. The CFO Suites

Defendant is unaware of the current location and logistics as to this person, and will supplement these disclosures upon determination of this information.

7. David Kovacs

c/o CMG Holdings Group, Inc.
2130 North Lincoln Park West 8N
Chicago, IL 60614
(773) 698-6047

8. Brandi Alexander

Defendant is unaware of the current location and logistics as to this person, and will supplement these disclosures upon determination of this information.

9. Matt Rapaport

3254 Glendon Ave.
Los Angeles, CA 90034
(310) 441-3907

10. David Heavenridge

8384 Stewart Ave.
Los Angeles, CA 90045
(619) 307-1139

11. Robert Flores

Defendant is unaware of the current location and logistics as to this person, and will supplement these disclosures upon determination of this information.

12. The Stephen Group

Defendant is unaware of the current location and logistics as to this person, and will supplement these disclosures upon determination of this information.

13. Doug Oliver

Defendant is unaware of the current location and logistics as to this person, and will supplement these disclosures upon determination of this information.

14. Thomas Miller

Defendant is unaware of the current location and logistics as to this person, and will supplement these disclosures upon determination of this information.

15. Lindy Bradshaw

Defendant is unaware of the current location and logistics as to this person, and will supplement these disclosures upon determination of this information.

16. Trenton K. Thornock

933 21st Street
Houston, Texas 77008-3317
(713) 862-1035

17. Jonathan Huberman

c/o Skyview Capital, LLC
8th Floor North Tower
2000 Avenue of the Stars
Los Angeles, CA 90067

18. Cesar Baez

c/o CA Baez & Partners, LLC
1271 Avenue of the Americas
43rd Floor
New York, NY 10020

19. Rick Mourgliia

c/o Dunn Energy, Inc.
2 Shell Plaza
811 Louisiana Street
Suite 23
Houston, TX 77002

20. Chris Willaford

Defendant is unaware of the current location and logistics as to this person, and will supplement these disclosures upon determination of this information.

21. Alfred Zaccagnino

c/o Samaritan Group
444 Madison Ave.
New York, NY 10022
(646) 755-3728

22. William Forkner

c/o Granite Bay Financial Group
1135 Fifth Way
El Dorado Hills, CA 95762

23. David Shanabrook

c/o Steller Energy & Investment
3629 Churchill Lane
Plano, TX 75075
(972) 673-1215

24. Joseph “Chip” Langston

c/o One Energy Square
4825 Greenville Ave.
Suite 200
Dallas, TX 75250
(214) 800-2614

25. Torchlight

John Burda
1031 Highlands Plaza Dr.
Saint Louis, MO 63110-1303

26. Paul B. Saltzman

1525 Elm St.
Dallas, TX 75201
(214) 747-0697

27. Stone Creek

Defendant is unaware of the current location and logistics as to this person, and will supplement these disclosures upon determination of this information.

28. Richard Munn

15 Camelot Oaks Ct.
The Woodlands, TX 77382
(281) 296-9414

29. Ellie Dragon

15 Camelot Oaks Ct.
The Woodlands, TX 77382
(281) 296-9414

30. Kurt Mire

c/o Mire & Associates
1830 Snake River Rd.
Katy, TX 77449
(281) 646-9878

B. Rule 26(a)(1)(A)(ii): Documents

The following are documents and/or tangible things that are in the Defendant's possession and that the Defendant may use to support his defenses:

1. The Corporate Minutes of Breitling Energy Corporation.
2. The Defendant may locate additional documents relating to issues in this case in hardcopy or electronic form. Should the Defendant determine that he may rely upon any such documents, those documents will be produced. The Defendant reserves the right to rely upon any documents he may produce to any other party to this litigation in response to discovery requests, as well as upon any other documents as may be produced by any party or third party in the course of this litigation.

C. Rule 26(a)(1)(A)(iii): Computation of Damages

N/A

D. Rule 26(a)(1)(A)(iv): Insurance

The Defendant is not currently aware of any insurance agreement under which an insurance business may be liable to satisfy part or all of any judgment that may be entered in this action or to indemnify or reimburse for payments made to satisfy any judgment.